DECISION RECORD

EA Number: OR-054-02-005
Title of Action: Monument Fire Complex Emergency Stabilization and Rehabilitation Plan
BLM Office: Prineville District, Central Oregon Resource Area

Decision: Based on the information in the EA, other scientific information available at this time, and one comment letter, it is my decision to allow the Monument Fire Complex Emergency Stabilization and Rehabilitation Plan to proceed as described in the Proposed Action. The seeding, using an approximately 70% native species mix, will be accomplished using mainly aerial application of seed mixtures, however some rangeland drilling may occur depending on soil conditions at the time of seeding. Seed application will be done before February 28, 2002 to maximize establishment of seeded species.

The fences, road closures, cattle guard installations, and reforestation will also be implemented as specified in the EA/ESR plan.

No livestock grazing will be authorized for two consecutive growing seasons on the fire rehabilitation area. This applies to those allotments that currently have authorized grazing. Other lands that were acquired through The Oregon Land Exchange Act (OLEA) of 2000, Pub. L. 106-257 (S. 1629), would not be grazed until a management plan is written for the area.

Alternatives Considered: Two alternatives were considered in the EA; 1) the no action Alternative, and 2) no seeding or reforestation; protection fence and road closures only.

Rational for Decision: The decision to implement the proposed action was made because of; 1) the immediate threat of erosion and sedimentation into anadromous fish streams; 2) the potential for noxious weed spread during the first few years after wildfire disturbance; 3) the need to accelerate the recovery of wildlife habitat; 4) the need to maximize the re-establishment of a healthy forested ecosystem by reforestation; 5) the need to repair fences and install cattle guards to protect not only the seeding, but allow for recovery of burned vegetation; and 6) the need to enact the Wyden Amendment to assist adjacent landowners to stabilize and rehabilitate the burned area to protect public land resources.

The decision to plant a mixture of native and non-native seed was made because there is the potential for severe competition of seeded species with cheatgrass, diffuse knapweed, and Scotch thistle, and a need to establish vegetation quickly to aid in sediment and erosion control. The mixture that is being proposed contains approximately 67% native species, and 33% non-natives, which should establish well together and protect from excessive soil erosion and compete with noxious weeds. There are only four non-native species to be seeded, they are: orchardgrass, small burnet, crested wheatgrass, and dryland alfalfa. All four species have been planted on rangelands extensively throughout the west. None of the species has shown a propensity to expand from the sites seeded. In addition, there is no evidence of these four non-native species

cross-pollinating with native species. There are no known sensitive plant species that occur in the project area, therefore there is expected to be no impact on sensitive plant species.

The window to get seed planted to aid in reduction of soil erosion and noxious weed expansion is rapidly closing. If burned areas are not planted by the end of February, the possibility for success will decrease immensely. The BLM feels that the seed mixture described in the proposed action strikes a good balance, with mostly native species being planted, and is the best mix to accomplish erosion, watershed, and noxious weed objectives.

Fence repair / reconstruction and cattle guards are needed to protect the burned and seeded areas of public land from livestock grazing which may occur within a year on adjacent private lands and BLM grazing allotments.

For additional rational refer to the attached Comment Analysis which is part of the Decision Record.

Conclusion: The Decision does not result in any undue or unnecessary environmental degradation and is in accordance with the John Day River Management Plan, Two Rivers, John Day and Baker Resource Management Plan Amendments, Environmental Impact Statement and Record of Decision; March 2001; and the John Day Resource Management Plan and Record of Decision, August 1985.

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Christina M. Welch Date
Central Oregon Resource Area Field Manager

Comment Response
Decision Record for the Monument Fire Complex Emergency Stabilization and Rehabilitation (ESR) Plan
EA Number OR-054-02-005

One comment letter was received on the EA, ESR Plan, and Finding of No Significant Impact (FONSI). Comments from the letter and the BLM's responses are the following.

Comment: *The BLM should "Avoid creating an even aged monoculture of trees by either not replanting or staggering the replanting over at least 20 years*."

Response: In the EA it is described that 400 forested acres would be replanted with two species, ponderosa pine and Douglas fir. By definition, this would not be a monoculture. The planting area will not be in one big 400-acre block. The 400 acres to be planted are scattered throughout numerous blocks of forested areas and will be planted in a mosaic. Essentially the fire burned very hot in pockets, when those pockets are planted they will even aged, but will be surrounded by other trees of differing age classes, creating an uneven aged stand. In addition, BLM policies do not allow the expenditure of Emergency Fire Rehabilitation funds for 20 years out.

Comment: *The BLM should "Avoid creating new sources of competition for native and sensitive plants by planting only native species and allowing room for sensitive plant species to grow in their suitable habitat areas. Exotic planted species may in the future crowd out native plants and using them creates an artificial ecosystem with myriad effects on micro site levels in regards to insects and other invertebrates and leading up the food chain. We are not convinced the exotic plants would die out."*

Response: The only places where the seed mix discussed in the Proposed Action will be planted are those areas where: 1) there is the potential competition of seeded species with cheatgrass, diffuse knapweed, and Scotch thistle; 2) those areas that burned very hot and are now excellent seedbeds for noxious weeds and have the potential to cause serious erosion / sedimentation problems; 3) and dozer lines that have had all the vegetation removed also creating a good seedbed for cheatgrass and noxious weeds, and the potential for erosion / sedimentation problems. The proposed mix will not be planted into stands of native bunchgrass in good condition. Native sagebrush and Great Basin wildrye will be interseeded on appropriate sites that currently contain good stands of native bunchgrass. The mixture that is being proposed contains 67% natives species, and 33% non-natives, which should establish well together and protect from excessive soil erosion and compete with noxious weeds. There are only four non-native species to be seeded, they are: orchardgrass, small burnet, crested wheatgrass, and dry land alfalfa. All four species have been planted on rangelands extensively throughout the west with crested wheatgrass introduced to North America some 70 years ago. None of the species has shown a propensity to expand from the sites seeded. In addition, there is no evidence of these four non-native species cross-pollinating with native species. Although there is potential for sensitive plant species to occur in the general area, they are not expected to occur in the vegetation types that are proposed for planting based on site condition and soil formations, therefore there is expected to be no impact on sensitive plant species.

Crested wheatgrass has been used extensively to seed unused cropland and to re-vegetate burns and degraded areas, including mine spoils [1,2,3,4,5,6]. Popovich and Pyke [7] concluded that seeding a wildfire-burned area in south-central Idaho to crested wheatgrass did not significantly reduce reproduction potential of Picabo milkvetch (*Astragalus oniciformis*), a sensitive plant endemic to the north-central Snake River Plain. The proposed seeding only recommends 1.5 pounds/acre of crested wheatgrass in a 13.75 pounds/acre mix.

Orchardgrass can establish well on wet meadow sites, but the areas to be treated are predominantly dry land sites so orchardgrass will not become a dominant plant. In areas disturbed by fire where orchardgrass has been seeded (usually in a mixture with other grasses and forbs), wildlife use increases over non-seeded areas and non-burned areas 8,9,10,11,12]. Orchardgrass is widely recommended and used for a variety of rehabilitation applications. It is recommended for planting with a mixture of grasses and legumes to reduce erosion after devegetation by fire. Orchardgrass often shows early success, eventually being replaced by native vegetation or other seeded species [13,14,15].

Seeding mixtures for re-vegetating areas damaged by wildfire often include alfalfa [16]. There is a general concern about introducing species into ecosystems; however, nitrogen-fixing species can be a way to facilitate invasion of native plants that have higher soil nutrient requirements than are present [17]. A general trend in western rangeland seedings is that initial establishment and productivity are usually good to excellent and drop off as the stand matures [18]. Graham [19] reported that 27 species of birds and 46 species of mammals are known to use alfalfa. Birds utilizing the leaves, flowers, or seeds include sage grouse, sharptailed grouse, pheasant, California quail, gray Partridge, American wigeon, mallard, and little brown crane [20,21,22]. The seeds are consumed by rodents, rabbits, upland birds, waterfowl, and songbirds. They are a preferred food for deer mice in Nevada [23]. Alfalfa is a source of nectar and pollen for insects [22,24]. Many small mammals, including jackrabbits, marmots, pocket gophers, prairie dogs, various ground squirrels, kangaroo rats, and mice graze alfalfa. Pocket gophers consume roots [19,22].

Information from USDA NRCS (2001) [25] notes small burnet is noted for value in mixes and its intended uses are erosion control, reclamation, rangeland improvement, wildlife forage, and site diversity. Small burnet is considered very desirable forage for elk, deer, antelope and birds either as herbage or seed. Birds use the seed in fall, winter and spring. It also provides cover for selected small bird species. It provides diversity to the plant community and can be planted and will establish in 12 inches or more rainfall areas, but generally does not persist below 14 inches. It has excellent cold winter and drought tolerance.

The window to get seed planted to aid in reduction of soil erosion and noxious weed expansion is rapidly closing. If burned areas are not planted by the end of February, the possibility for success will decrease immensely. The BLM feels that the seed mixture described in the proposed action strikes a good balance, with mostly native species being planted, and is the best mix to accomplish erosion, watershed, and noxious weed objectives. The decision to use a mixture of native and non-native species is consistent with the John Day River Management Plan, Two Rivers, John Day and Baker Resource Management Plan Amendments, Environmental Impact Statement and Record of Decision; March 2001, pp 159-160.

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Comment: "*To more fully protect destabilized soils and recovering plant life livestock should be kept out of the burned area for at least five years, which is in accordance with current scientific recommendations for burned areas."*

Response: The recently released Interagency Burned Area ESR Handbook (June 2001) has specific policy guidance for the BLM as it relates to livestock grazing. The Directors of the United States Forest Service, BLM, Fish and Wildlife Service, National Park Service and the Deputy Commissioner of Bureau of Indian Affairs are responsible for all burned area emergency stabilization and rehabilitation activities (including such activities when contracted for, in whole or in part, with other agencies or tribes) under the statutes cited in Forest Service Manual 2500 and Department of the Interior 620 Departmental Manual (DM) 3.1. Each wildland fire management agency is responsible for taking prompt and effective action in the burned area emergency stabilization and rehabilitation program and implementing Departmental policies.

Exhibit 4-2, BLM Policy Supplement, states that "Exclusion of livestock is critical for the recovery of burned vegetation or establishment and maintenance of new seedings and use of these areas should not be permitted until the vegetation recovers or is established. Both re-vegetated and, burned but not re-vegetated areas, will be closed to livestock grazing for at least two growing seasons following the season in which the wildfire occurred to promote recovery of burned perennial plants and/or facilitate the establishment of seeded species. Livestock permittees must be informed of the closure early during the plan reparation process, and livestock closures will be made a condition or term on the grazing license or permit through the issuance of grazing decision (see 43 CFR 4160). Livestock closures for less than two growing seasons may be justified on a case-by-case basis based on sound resource data and experience. Livestock management following seedling establishment and/ or burned area recovery should maintain both non-native and/or native species to meet land use (including Standards for Rangeland Health and Guidelines for Grazing Management) or activity plan objectives."

This policy is for those lands in the area that currently have authorized grazing. Seeding success will be monitored and evaluated. If, after two years, monitoring results show that seeded species have not established well enough to resume grazing and additional rest is warranted to ensure establishment, additional rest from grazing will be considered.

The majority of the burned area (approximately 90%) occurs on land that was acquired through The Oregon Land Exchange Act (OLEA) of 2000, Pub. L. 106-257 (S. 1629), and would not be grazed until a management plan is written for the area. OLEA specifically directs the Bureau of Land Management to manage the lands for fish, wildlife and recreation and states in Section 6 (g): "MANAGEMENT OF LANDS.-(1) Lands acquired by the Secretary of the Interior under this Act shall be administered in accordance with sections 205(c) of the Federal Land Policy and Management Act (43 U.S.C. 1715(c)), and lands acquired by the Secretary of Agriculture shall be administered in accordance with sections 205(d) of such Act (43 U.S.C. 1715(d)). (2) Lands acquired by the Secretary of the Interior pursuant to section 4 which are within the North Fork of the John Day sub-watershed shall be administered in accordance with section 205(c) of the Federal Land Policy and Management Act (43 U.S.C. 1715(c)), but shall be managed primarily for the protection of native fish and wildlife habitat, and for public recreation. The Secretary may permit other authorized uses within the sub-watershed if the Secretary determines, through the appropriate land use planning process, that such uses are consistent with, and do not diminish these management purposes."

Comment: *" Suggest to not use rangeland drilling so as to protect archaeological sites and avoid further destabilizing the soil and water pathways so soon after the fire."*

Response: Areas that are seeded with a rangeland drill will be cleared for archaeological sites before implementation to ensure no sites are damaged. In most ESR plans rangeland drills are used to maximize the possibility of establishment of seeded species to protect the taxpayer's investment. The drills increase the likelihood of success by improving the seed to soil contact and in many cases providing a microclimate that protects the seed in the drill row from harsh climatic conditions. The drill rows in the soil produced by using a rangeland drill are typically not noticeable a couple of years following project completion. However, many times, rangeland drills are not practical because of steepness of terrain, soil moisture, or species being planted. Many of the slopes in the project area are too steep for rangeland drill use, therefore only 400 acres were identified for rangeland drill planting. Because of the length of time it took to prepare this ESR plan, the soil on much of the 400 acres identified for rangeland drill use will be too saturated to drill without possible damage to the soil. The total number of acres seeded by a rangeland drill will be reduced, although the option to use the drill on areas will remain, depending on soil conditions.